

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

The State of Texas, et al.,

Plaintiffs,

v.

Google LLC,

Defendants.

Case No. 4:20-cv-00957-SDJ

Hon. Sean D. Jordan

Special Master: David T. Moran

**UNOPPOSED MOTION TO FILE UNDER SEAL**

Plaintiff States (“States”) respectfully move the Court for leave to file under seal PLAINTIFF STATES’ MOTION TO DEEM SUPPLEMENTAL EXPERT REPORT OF JACOB HOCHSTETLER TIMELY SERVED and the exhibits thereto (“States’ Motion and Exhibits”), to be filed later today. Defendant Google LLC (“Google”) does not oppose the States’ sealing request.

The States, with Google’s consent, request to file under seal the States’ Motion and Exhibits because they reference materials, including a supplemental expert report, that contain information Google has designated as highly confidential. Google intends to propose publicly available versions of these documents be filed with limited redactions only to protect any highly confidential information. Consistent with Local Rule CV-5, the States will work with Google to file redacted versions—with as limited redactions as possible—within seven (7) days.

For the reasons stated above, the States respectfully request that this Court allow the States to file the above-referenced documents under seal.

DATED: October 17, 2024

/s/ W. Mark Lanier

W. Mark Lanier

[Mark.Lanier@LanierLawFirm.com](mailto:Mark.Lanier@LanierLawFirm.com)

Alex J. Brown

[Alex.Brown@LanierLawFirm.com](mailto:Alex.Brown@LanierLawFirm.com)

Zeke DeRose III

[Zeke.Derose@LanierLawFirm.com](mailto:Zeke.Derose@LanierLawFirm.com)

Jonathan P. Wilkerson

[Jonathan.Wilkerson@LanierLawFirm.com](mailto:Jonathan.Wilkerson@LanierLawFirm.com)

10940 W. Sam Houston Pkwy N.

Suite 100

Houston, TX 77064

(713) 659-5200

**THE LANIER LAW FIRM, PLLC**

Respectfully submitted,

/s/ Ashley Keller

Ashley Keller

[ack@kellerpostman.com](mailto:ack@kellerpostman.com)

150 N. Riverside Plaza, Suite 4100

Chicago, IL 60606

(312) 741-5220

Zina Bash (Bar No. 24067505)

[zina.bash@kellerpostman.com](mailto:zina.bash@kellerpostman.com)

111 Congress Avenue, Suite 500

Austin, TX 78701

(512) 690-0990

/s/ Noah S. Heinz

Noah S. Heinz

[noah.heinz@kellerpostman.com](mailto:noah.heinz@kellerpostman.com)

Kiran N. Bhat

[kiran.bhat@kellerpostman.com](mailto:kiran.bhat@kellerpostman.com)

1101 Connecticut Ave., N.W., Suite 1100

Washington, DC 20036

(202) 918-1123

**KELLER POSTMAN LLC**

*Counsel for Texas, Idaho, Louisiana (The Lanier Law Firm only), Indiana, Mississippi, North Dakota, South Carolina, and South Dakota*

*Submitted on behalf of all Plaintiff States*

**NORTON ROSE FULBRIGHT US LLP**

Joseph M. Graham, Jr.  
joseph.graham@nortonrosefulbright.com  
Geraldine Young  
geraldine.young@nortonrosefulbright.com  
1550 Lamar Street, Suite 2000  
Houston, Texas 77010  
(713) 651-5151

Marc B. Collier  
Marc.Collier@nortonrosefulbright.com  
98 San Jacinto Blvd., Suite 1100  
Austin, Texas 78701  
(512) 474-5201

FOR PLAINTIFF STATE OF TEXAS:

KEN PAXTON  
Attorney General

/s/ Trevor E. D. Young

Brent Webster, First Assistant Attorney General of Texas  
[Brent.Webster@oag.texas.gov](mailto:Brent.Webster@oag.texas.gov)  
James R. Lloyd, Deputy Attorney General for Civil Litigation  
[James.Lloyd@oag.texas.gov](mailto:James.Lloyd@oag.texas.gov)  
Trevor Young, Deputy Chief, Antitrust Division  
[Trevor.Young@oag.texas.gov](mailto:Trevor.Young@oag.texas.gov)

**STATE OF TEXAS, OFFICE OF THE ATTORNEY GENERAL**  
P.O. Box 12548  
Austin, TX 78711-2548  
(512) 936-1674

*Attorneys for Plaintiff State of Texas*

**CERTIFICATION OF CONFERENCE**

I certify that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that Google LLC does not oppose the foregoing sealing request.

/s/ Noah S. Heinz  
Noah S. Heinz

**CERTIFICATE OF SERVICE**

I certify that on October 17, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Noah S. Heinz  
Noah S. Heinz